

We are concerned with several issues raised in your reinterpretation. For instance, the clause removing the "established business relationship" qualification from the fax regulations is absolutely bad for business. It forces our association and other companies to obtain the written consent of our own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature. We also wonder what you will interpret as commercial in nature. If we have a fax newsletter that is 90% news and has one comment regarding attending a meeting, does that qualify or not? The association community has already raised numerous concerns about the new regulations that we wonder about. Would written consent to a national association would extend to chapter or affiliate faxes? Would a written consent form expire with membership? These are questions that must be answered if this is to be implemented. However, we urge you to rethink the implementation and delete associations from the groups involved in this rule. Our members have already joined, and paid to join our organization. Thus, they have proven that they wish to "associate" with us. This proposed change is ludicrous to apply to associations.